



December 19, 2022

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC
SPX and *SkinnySchool* Submission in response Defendant Google LLC's
Response to Plaintiff's Motion for Leave to File the Consolidated Amended
Class Action Complaint Under Seal.**

Dear Judge Castel:

We represent the plaintiffs in *SPX Total Body Fitness LLC v. Google LLC*, 21-cv-00801 (N.D. Cal.) ("*SPX*") and *SkinnySchool LLC, et al. v. Google LLC*, 21-cv-06011 (N.D. Cal.) ("*SkinnySchool*"). We write in response Defendant Google LLC's Response to Plaintiff's Motion for Leave to File the Consolidated Amended Class Action Complaint Under Seal (ECF No. 418).

On November 10, 2022, Plaintiffs sought leave to file a Consolidated Class Action against Defendant Google LLC ("Google") on behalf of all persons and entities who purchased advertising on or over Facebook from September 1, 2018 to the present (ECF No. 380).

The Court granted the Plaintiffs' request as part of its Pre-Trial Order No. 4 on November 18, 2022 (ECF No. 392). In accordance with that order, Plaintiffs filed the Consolidated Class Action Complaint on December 2, 2022 (ECF No. 404). After filing the complaint, Plaintiffs received correspondence from non-party Meta Platforms, Inc., f/k/a. Facebook Inc.'s counsel requesting certain redactions. Plaintiffs immediately responded that class plaintiffs would grant each of these requests and filed a corrected redacted complaint on the public docket. *See* ECF Nos. 409 (Dec. 2, 2022) and 410 (Dec. 6, 2022).

Pursuant to the Court's December 6, 2022 Order (ECF No. 410), the Plaintiffs filed an Amended Consolidated Class Action Complaint on December 12, 2022 (ECF No. 416). This complaint contains the redactions which Google now requests the Court order be completed in their response. *See* Dec. of Justina Sessions in Support of Defendant Google LLC's Response to Plaintiff's Motion for Leave to File the Consolidated Amended Class Action Complaint Under Seal, ECF No. 420-1 (Dec. 16, 2022).

Since the Plaintiffs have already made the requested redactions, we request the Court deem Google's request moot. Since all parties agree with the current redactions in the Amended Consolidated Class Action Complaint (ECF No. 416), we ask the Court grant Plaintiffs' motion for leave to file the Complaint under Seal (ECF No. 403) with no further redactions necessary.

Respectfully submitted,

/s/ Fred T. Isquith Jr.

Fred T. Isquith, Jr.
Zwerling, Schachter & Zwerling, LLP
41 Madison Avenue, 32nd FL
New York, NY 10010
Tel: (212) 223-3900
ftisquith@zsz.com